



PRE-APPLICATION ADVICE

**Planning & Building Control
Civic Offices
Bridge Street
Reading
RG1 2LU**

Website: www.reading.gov.uk

"Without Prejudice" Advice

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Pre-application Advice - Reference 240617

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Provided by Jonathan Markwell (Principal Planning Officer at Reading Borough Council) on 25/07/2024 after a meeting undertaken 26/07/2024 (10.10am – 11:10am), attended by Mifta Ahmed (Cityscape), Russell Gia (representative of the applicant) and Jonathan Markwell.

In addition, a site visit took place (attended by Mifta Ahmed and the prospective applicant's property manager, Jonathan Markwell and Burcu Can Cetin [Conservation Officer]) on 19/06/2024 at 3pm.

Address of site: Belle Vue Hotel, 2 Tilehurst Road, Reading, RG1 7TN

Description of proposed development: Change of use and conversion from a hotel (Use Class C1) into 7 x 1-bedroom flats (Use Class C3), together with associated internal works to the listed building and external site works including 7 x car parking spaces, 8 x cycle parking spaces and soft landscaping

Name, address, telephone and email address of agent/person making this enquiry.

Mifta Ahmed 6 Spencer Way, London, E1 2PN mifta@outlook.com / admin@cityscape.ltd

Type of formal application proposed or advice sought.

Full planning permission and listed building consent. Advice sought on the appropriateness of the proposals.

Details & dates of any previous relevant applications

90-01002-LBC Formation of one new opening in side boundary wall & improvement to existing opening in same for access closing existing vehicle access for safety. Permitted 04/12/1990.

93-00358-FUL Change of use from Guest House (partial - 7 rooms) to full guest house (Class C1), including associated landscaping/car parking/grounds improvements. Permitted 29/07/1993.

200219/FUL & 200220/LBC - Proposed change of use from C1 use (Guest House of 18No bedrooms) to Sui Generis use as a 'larger' Home in Multiple Occupation - HMO of 18No bedrooms. Refused planning permission and listed building consent 29/07/2020.

211385/FUL & 221386/LBC - Proposed change of use from C1 use (Guest House of 18No bedrooms) to Sui Generis use as a 'larger' Home in Multiple Occupation - HMO of 14No bedrooms. Withdrawn 18/02/2022.

List of any documents, photographs or plans submitted with this enquiry.

19/566/001 Site Location and Block Plan

19/566/002 Existing Site Plan

19/566/003 Existing Plans

19/566/004 Existing Elevations

19/566/005 Proposed Site Plan

19/566/006 Proposed Plans

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19/566/007 Proposed Elevations

Proposal Statement 2 Tilehurst Road, Reading, RG1 7TN by Cityscape Planning & Architecture

Details of any consultations done or proposed to carry out at pre-application stage.

None specified.

When do you anticipate submitting a formal application?

August 2024

Officer response

Site description

The prospective application site relates to the Grade II listed 'Bellevue Hotel', located on the northern side of Tilehurst Road, at the junction with Belle Vue Road (to the west). The site is therefore a corner plot, with vehicular and pedestrian access solely possible from Tilehurst Road. As seen during the officer site visit, a previous entrance point off Belle Vue Road has been blocked up with brickwork.

The surrounding area is a mix of residential, commercial and retail properties, with largely residential on the north side of Tilehurst Road and a vets centre and petrol station opposite the site to the south.

The site is within the Castle Hill/Russell Street/Oxford Road Conservation Area and is also within an Air Quality Management Area.

The relevant Conservation Area Appraisal mentions the building specifically:

"The Grade II Bellevue Villa is the only other remaining early estate house of this type in the character area and is located on Tilehurst Road. It functions currently as a bed and breakfast. Its exterior is reasonably well maintained, although the garden is given over to parking and could be more sensitively landscaped. It still retains original windows and has two Regency styled Coade stone decorative urns set on the roofline at each side."

Land use considerations

For any proposal of this nature, the starting point for any future assessment is considering the existing lawful use of the building and seeking to establish whether the loss of this use is appropriate for this Listed Building. In this instance, the lawful use is as a Class C1 hotel. There are no explicit policies within the Reading Borough Local Plan which seek to protect existing hotel uses, although as an employment generating use, it is possible for the loss of the existing use to be considered against Policy EM3 (Loss of Employment Land). This policy includes a set of criteria, for which your future application should include commentary against each point. It is likely that a case can be made which will enable officers to support the loss of the existing employment use of the building – and noting that this in itself was accepted under application 200219 – however, the onus is on you to demonstrate this, in line with Policy EM3.

Should the loss of the existing use be able to be supported, then the principle of wholly residential use at the site would align with the broad objectives of Policy H1 (Provision of Housing) by contributing to meeting the housing needs within the Borough.

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Design/Heritage/Conservation considerations

The Council's Conservation Officer, Buju Can Cetin, undertook a site visit and her subsequent comments, in full, are as follows:

Summary

No objection but Clarification Required – The proposal would be acceptable in principle. It appears that the proposed works can potentially improve the existing condition of the building and its setting. However, it should be accompanied by a heritage statement and schedule of works that justifies any significant alteration (such as the replacement of windows). The proposed works would probably meet the requirements of Policies EN1, EN3 and EN6 of the Reading Borough Local Plan.

Relevant policies and legislation

From the point of view of the historic environment, the main statutory tests are set out within the Planning (Listed Buildings and Conservation Areas) Act 1990. Sections 16(2) and 66 require that **special regard** be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character and appearance of designated Conservation Areas.

National Planning Policy and Guidance

The NPPF outlines government policy, including its policy in respect of the historic environment. Chapter 16 of the NPPF (2023) 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development.

Paragraph 200 states, *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting."* And Paragraph 201 says, *"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."*

Paragraph 205 of the NPPF requires that *'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation....'* And paragraph 206 says, *'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification'.*

Paragraph 208 requires that *'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...'*

National Planning Practice Guidance on Historic Environment provides context to the NPPF.

Local Planning Policy and Guidance

Policy EN1 'Protection and enhancement of the historic environment' of the Reading Borough Local Plan sets out the Council's aspirations for the historic environment. The policy requires that all proposals to protect and, where possible, enhance the significance of heritage assets and *their settings*, historic character and local distinctiveness of the area in which they are

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located. It echoes the NPPF by stating, *“Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits”*.

Applications which affect *Listed Buildings* are expected not to have an adverse impact on the elements that contribute to their special architectural or historic interest, including their settings.

Policy EN3 ‘Enhancement of conservation areas’ of the Reading Borough Local Plan requires that development proposals within Conservation Areas contribute positively to local character and distinctiveness. This policy further states *“Positive consideration will be given to proposals which take opportunities to enhance the character of conservation areas.”*

Policy EN6 ‘New development in a historic context’ also requires *“New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development. When determining planning applications for new development, the following factors will be taken into consideration:*

- a. The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);*
- b. Sensitivity to historic context;*
- c. Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing);*
- d. Whether development promotes and/or improves access to previously undiscovered or neglected historic significance.”*

Castle Hill/Russell Street/Oxford Road Conservation Area Appraisal is also a material consideration in determining applications for development.

Other Guidance

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for Planning Permission and Listed Building Consent.

English Heritage’s “Conservation Principles” provides policy and guidance for the “sustainable management of the historic environment”.

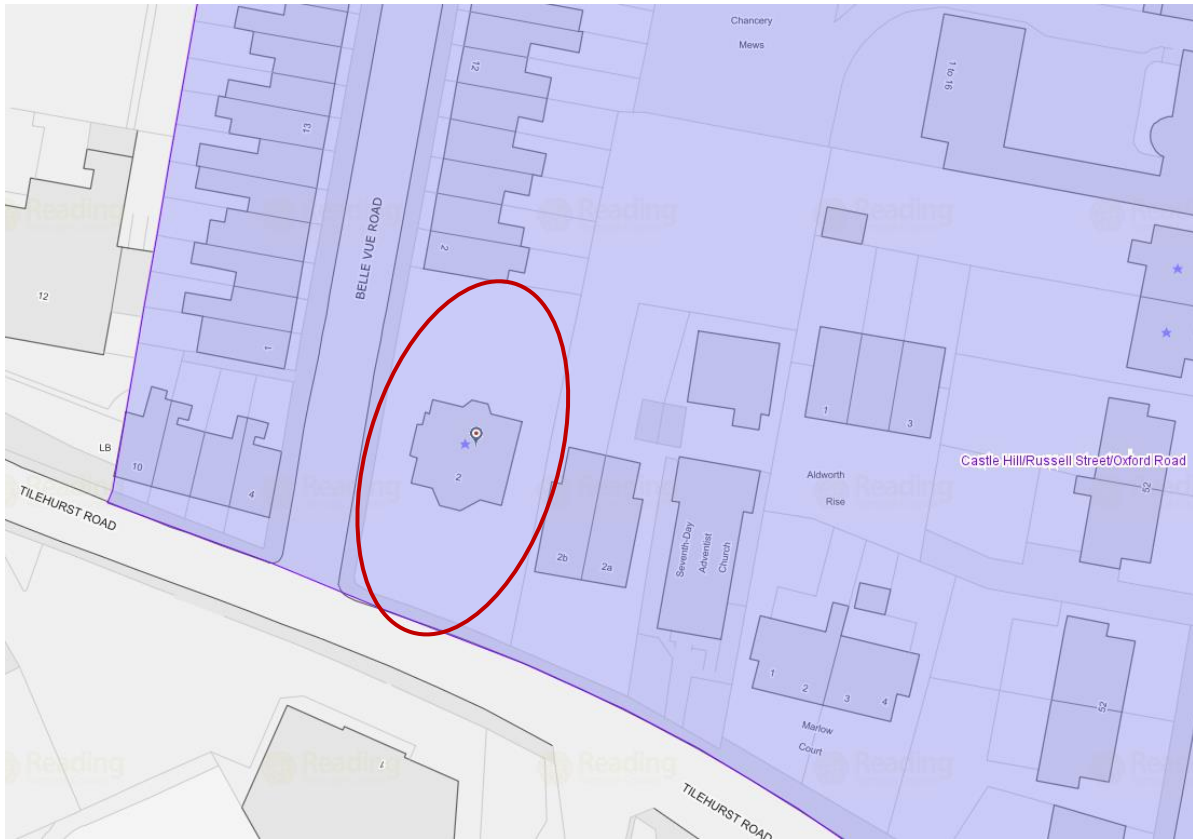
Relevant heritage assets

This application relates to an attractive Grade II-listed Later Regency and Early Victorian villa, ‘Bellevue’, located on the corner of Tilehurst Road and Belle Vue Road within the Castle Hill/Russell Street/Oxford Road Conservation Area.

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The application site (circled in red), Listed buildings (purple starred) and conservation area (light purple)

Significance of heritage assets

The NPPF defines significance as the “*value of a heritage asset to this and future generations because of its heritage interest.*”

The interest may be architectural or historic, as set out in the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 Section 1.

“Significance derives not only from a heritage asset’s physical presence, but also from its setting.” (NPPF, 2023)

Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

The listed building's original site layout and footprint appear on the Board of Health Map (1853) and the OS Map of 1875 (published in 1879), showing the large landscaped garden of Bellevue, as illustrated below.

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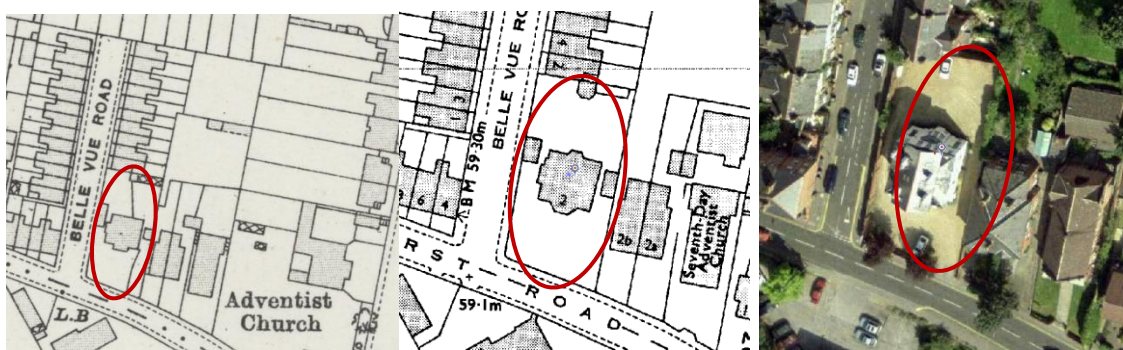
Historic layout of the application site in 1853 (Left) and 1875 (Right)

The original curtilage was changed to divided and separated to constitute Belle Vue Road and terraces on this street in the late 19th Century. As such, the existing footprint of the Listed building has remained the same while the original curtilage became smaller in size, as existing.



The Application Site on the OS Maps of 1898 (published in 1900) (Left) and 1909 (published in 1912) (Right)

According to the following historical maps, the listed building had some outbuildings within its curtilage from the 1930s to the 1970s but did not survive in the 2000s.



The Application Site in the 1930s (Left), 1950s (Middle) and 2002 (Right)

It is noted that the application site and the Listed building were converted into guest houses and hotel accommodation, while there have been many change-of-use applications to convert the building into HMO rooms in recent years [not approved]. Therefore, the internal layout of

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the original building is not legible, although the main rooms of the listed villa still have architectural elements of the listed villa.

The Listed building's external features, on the other hand, such as bow windows, extra attic space, and raised basement, reveal its being a large house of the period. The official listing descriptions for the subject building and its adjoining neighbours are given below:

2, Tilehurst Road

"1. 5128 SU 7073 12/365 21.1.76

TILEHURST ROAD (North Side) No 2

II

2. Previously called Bellevue. Built before 1839 as a detached 2 1/2 storey stucco villa on basement. Front: 3 bays the centre a 2 storey canted 3 window bay with round headed windows on ground floor, open arcade to basement, segmental attic window. Glazing bar and cross glazed sash windows. Central break is higher with pediment gable formed of bracket verges and eaves. Wings have impost string carried over centre and cornices and blacking courses with central panels surmounted by elegant oval shaped urns, possibly of Coade stone. Flight of steps to doorway to right, flanked by panels and with radiating and wreathed fanlight. Slate roof with prominent corniced chimney stacks. North front similar but grander with bullseye attic window and arched recess with urn over centre window.

Listing NGR: SU7065773078"

Impact of proposal upon heritage asset(s)

Listed curtilage

The proposal introduces soft landscaping, parking spaces for seven cars, cycle parking for eight bicycles, a bin store, and new surfacing, and retains existing trees, gates/entrances and garden walls. In principle, these works would be beneficial to the listed curtilage, character and appearance of the conservation area. However, further clarification is required regarding the details of the proposed elements and their materials. In addition, given the curvy lines of the original garden arrangement, the lines of the proposed greenery could be redesigned, and if the garden walls are to be repaired or repointed, this should be included in the application. The submitted Proposal Statement should be broadened to include heritage and heritage impacts of the proposal.

External Works to the Listed Building

Whilst there is no indication that the façade of the building would be adapted, the design of the windows on both the existing and proposed front elevation does not show the existing design (four-pane sash windows on the first floor, etc.). To the rear elevation and side elevations, there are existing replaced uPVC windows, which should be considered as a part of any formal application to reinstate the original window design and material. The existing flues, gutters and the blocked ground-floor window on the façade can/should also be explored to be replaced/reinstated as part of your emerging proposals. In summary, the reinstatement of original features should be considered. These would generally be welcomed, helping to demonstrate that the proposals are both protecting and enhancing the heritage asset, as per the Policy EN1 requirements.

Please note that if the proposed works would replace the existing original windows, then strong justification is required to accept this; otherwise, secondary glazing would be more appropriate in line with Historic England's Advice.

Internal Works to the Listed Building

During the site visit, it was noted that the existing (but vacant) hotel use already divided the original spaces/rooms of the Listed building and inserted bathrooms and a kitchen for the

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existing accommodation, and there is a damp problem on the lower ground floor/basement floor of the Listed building. The proposal utilises existing bathrooms and services for the proposed flats, which are welcomed. However, the introduction of new kitchens would result in little harm and the existing condition of the building should also be addressed in any proposal so that the new use, which is not the original use, would be weighed against its obvious/expected benefits for the survival/preservation of the heritage asset.

It is also crucial that the application(s) should come with a clear definition of the significance of the historic building fabric (such as brickwork, lathe and plaster, floorboards, joists, beams, etc.) internal fixtures, finishes and decorative items and proposed works under a schedule of works. As the interior of a listed building is generally of equal importance as the exterior, the building should be considered as a whole in relation to its significance.

From a conservation perspective, the principal rooms at the ground and first-floor levels should normally remain undivided, and lobbies should be avoided in these rooms. However, 'galley' kitchens within front rooms are often acceptable, provided they can be mechanically ventilated and serviced without visually harmful ducting or piping. For the subject building, as there are already some divisions in the main rooms, I would raise no objections subject to details of materials to be submitted.

To conclude, the proposal would be acceptable in principle. It appears that the proposed works have the potential to improve the existing condition of the building and its setting, and it would probably meet the requirements of Policies EN1, EN3 and EN6 of the Reading Borough Local Plan.

Conservation response

- ☐ No objections
- ☐ No objections subject to conditions attached
- ☒ Clarification required
- ☐ Object

As such, it is evident from the above comments that the Conservation Officer, subject to some clarifications, is largely supportive of the emerging proposals. I share this viewpoint, with the refurbishment and active use of the presently vacant Listed building likely to be a key benefit in your future proposal.

Mix of units

Policy H2 (Density and Mix) states that wherever possible, residential development should contribute towards meeting the needs for the mix of housing set out in figure 4.6 of the Local Plan, in particular for family homes of three or more bedrooms. Whilst there is no prescriptive standard for fewer than 10 unit schemes, these emerging proposals do not seek to provide any mix of different sized residential units, with 7 x 1-bed units proposed.

As such, there is an identified conflict with Policy H2. You are therefore advised to explore options to address this shortfall, such as:

- 1) the lower ground floor unit being converted to form 1 x 3-bed unit rather than 2x1-bed units (therefore creating 6 units – 5x1 & 1x3-bed), or
- 2) combining one of the proposed first floor units with the roof-level unit to form a first and roofspace maisonette unit (again creating 6 units – 5x1 & 1x3-bed), or

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- 3) altering the largest units – flat 3 and 6 – so that the standalone kitchens become bedrooms and the current living and dining rooms becoming combined living/dining/kitchen rooms. This would retain 7 units, but alter the mix to 5x1 & 2x2-bed units. It is acknowledged that stacking issues would arise from this. It is also noted that the units are slightly below the nationally prescribed space standards for 2-bed units, although some flexibility could be offered in this instance owing to the listed nature of the building and this being a change of use proposal, rather than a new build (as referenced by Policy H5: Standards for New Housing, where the space standards are referenced in the supporting text to the policy).

Officers consider that option 1) of the above would be preferred, particularly owing to the limited access to direct light and outlook from flat 2 at lower ground floor level (as separately discussed in the quality of accommodation section below).

Alternatively, you could seek to continue with your current proposal of solely providing 1-bed units and seek to justify this noting that the policy specifies that a mix of different unit sizes is required “wherever possible”. You could seek to justify that it is not possible in this case. For example, it is considered that you may choose to advance a case whereby the listed nature of the property and the benefits of bringing it back into active use outweighs the deficiencies of the absence of a mix? Another angle to explore is that if fewer units are proposed then a policy compliant financial contribution towards affordable housing would not be possible (assuming that a policy compliant contribution is provided as part of the proposed scheme) on viability grounds. The onus would be on you in these regards and the local planning authority would consider this accordingly at application stage.

Affordable Housing

As per Policy H3 (Affordable Housing), any 5-9 unit scheme of this nature would be required to provide 20% of the Gross Development Value (GDV) in the form of an affordable housing financial contribution towards off-site provision elsewhere in the Borough.

In practice, at application stage officers will require three separate sales valuations of each of the proposed residential dwellings (based on the proposed plans) from local estate agents. These should be submitted at the outset of the application to enable the validation of the application. The financial contribution would actually equate to 10% of the GDV, as per the Affordable Housing SPD and would be verified by the Council's Valuers (to ensure they reflect the current market values). If accepted, an average of the agreed sales values from the three local agents would then be secured.

For example, if units 3,4,5 and 6 were each valued at £300,000 and units 1,2 and 7 were valued at £250,000, then the total value would be £1,950,000 = £1,950,000 x 0.1 = £195,000 financial contribution.

This contribution would be used to grant fund and bring forward affordable homes for nomination by Reading Borough Council. The financial contribution towards affordable housing would be secured in full via Section 106 Legal Agreement.

The policy goes on to set out that in cases where proposals fall short of the policy target for affordable housing then this would need to be evidenced by way of a detailed viability appraisal (the Council's Affordable Housing SPD sets out what information is required to be provided as part of an appraisal). Any viability appraisal submitted would be subject to review by the Council's Valuer. The review process can be lengthy and subject to detailed negotiations and

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is subject to an additional fee, separate from the planning application fee, as [explained on the Council's website](#). In particular, at the time of any application submission which includes a viability report, this should separately be submitted to the Council's Valuers, seeking a fee quote, which would then be sought, received, agreed and paid prior to the assessment of the viability evidence commencing.

If any viability case sufficiently justifies that a less than policy compliant contribution towards affordable housing should be made, it is likely than any shortfall (in comparison with the policy compliant amount) would necessitate a deferred contribution mechanism being required and secured. This is detailed at paragraphs 6.12 – 6.14 of the Affordable Housing SPD and essentially seeks to re-review viability at a later stage (where the viability position could be very different), thereby ensuring a share of any increased profits (in comparison with the application stage viability position) are secured for affordable housing (typically as a commuted financial contribution for schemes elsewhere in the Borough). The deferred contribution mechanism would be secured via s106 legal agreement.

Please also note that if you subsequently submit a viability report, it will be expected for this to be made publicly available in full, as per the clear advice within paragraph 021 of the viability [Planning Practice Guidance](#). If applicable at the time of your future application submission, please confirm, or provide reasons (which would need to be exceptional circumstances, in line with PPG) why this would not be agreed, for consideration (and, if applicable, an executive summary – again following the PPG advice).

Quality of accommodation for future occupiers

Paragraph 4.4.42 of the supporting text to Policy H5 (Standards for New Housing) specifies that the nationally prescribed space standards offer a useful point of reference and good basis for the design of new developments, even in instances where it does not technically apply. Accordingly, whilst not applying in this case (as this is a change of use conversion proposal), the standards are still a good basis to guide your emerging proposals.

In particular, it is advised that the size of some bedrooms appear to be close to the minimum 7.5sqm and it is presently unclear whether sufficient floor to ceiling heights are provided within the roofspace? Section plans at application stage will help demonstrate the floor to ceiling heights. Furthermore, no indication of any dedicated storage spaces are specified on the current plans submitted. It is noted that by your calculations the overall floorspace totals for the units are all in excess of the minimum requirement for 1-bed, 1 person units. It would therefore appear that the proposals have been advanced with the standards in mind. You are advised to consider this further and demonstrate adherence with the standards as part of your future submission.

Some specific concerns are raised in respect of the future amenity of occupiers of Flat 2 at lower ground floor level. Levels of outlook and access to day/sunlight are likely to be constrained by the limited size of the windows and, in respect of those on the south elevation, these being enclosed by the bay window serving the upper ground floor level. Please see an internal site photograph and external streetview photos (as these windows were boarded up at the time of the site visit). It will be for you to seek to justify that these inherent shortcomings do not cause unacceptable living conditions for new residential properties, contrary to Policy CC8 (Safeguarding Amenity). For example, the listed nature of the building may be a constraint used to justify the proposals? Any justification would be considered on its merits at the time of any future application. As per the mix section above, one solution may be to provide

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only a single (larger) unit at lower ground floor level, rather than two units as presently proposed.



Officer site visit photo (internally) and two Google streetview images.

In other regards, it appears to the upper floor units have suitable access to outlook and day/sunlight, with the units stacked to seek to reduce instance and noise and disturbance between separate units, which should be aimed for in any mix alteration too. Your design and access statement at application stage should comment on the steps taken to ensure a good standard of accommodation is provided for future occupiers.

Policy H10 (Private and Communal Outdoor Space) specifies that functional private or communal open space will be provided, allowing for sitting out, children's play areas, home food production, green waste composting, refuse storage, drying space. "The design of outdoor spaces will respect the size and character of other similar spaces in the vicinity". Paragraph 4.4.87 of the Local Plan sets out that "in the past, the Council has sought the following minimum provisions for private or communal outdoor space for each type of accommodation, and they provide a useful guide for proposals: (b) Flats outside central Reading: 1 and 2-bedroom: 25 sq m per flat..".

In this regard, it is welcomed in principle that the emerging proposals include communal outdoor soft landscaping areas for future residents. It is however considered that this area is not being maximised at present and further space should be provided, for the benefit of future occupiers. In particular, it is considered that ideally the whole of the space to the north (rear) of the building should be provided for communal outdoor space, limiting car parking, cycle parking and waste storage / collections to the south (front) of the building, so that future occupiers have a meaningful and beneficially-sized space for their shared amenity. This arrangement would align with the prevailing character at 2a/2b Tilehurst Road to the east,

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thereby improving the amenity of these occupiers by removing the possibility of vehicles accessing the rear of the site adjacent to these existing gardens. I consider that fewer vehicle parking spaces (solely located at the front of the site) could be justified in this instance, given the accessible location of the site and provision of on-street parking restrictions in the vicinity of the site. Limiting the extent of space provided for parking would also be likely to assist in the proposals preserving and enhancing the character and appearance of the conservation area and enhance the setting of the Listed building.

In terms of waste storage, it is noted that the site plan indicates the provision of 2 bins. This is likely to be insufficient, with the requirements likely to amount to:

7 x 140l general waste bins = 980l = 1 x 1100l general waste bin

7x 240l recycling bins = 1680l = 1 x 1100l recycling bin and 1 x 660l recycling bin

7 x 23l food waste bins = 161l = 1 x 180l food waste bin

This is on the basis of bin provision information available [via the Council's website](#), with communal facilities for flats based on the number of flats. This does not vary dependent on the size of flats/number of occupants. The provision stands at 120-140L for general waste, 240L for recycling and approximately 23L for food waste per flat. This is then rounded up/down to fit the size that the Council's bins are stocked in – either 1100L, 660L, 360L, 240L or 140L. Sufficient space is required for bins to be provided and they need to be located within 10m of the kerbside collection point to enable an efficient service. Please bear this in mind when preparing your application submission, with the site plan at application stage anticipating to include annotations stating each type of bin provided and an annotation demonstrating it is within 10m of a kerbside collection point.

It is noted that the proposed plans indicate an opening on the Belle Vue Road elevation is sought, to access the adjacent bin and cycle areas. During the officer site visit this entry point was shown to have been enclosed, albeit the brickwork (and historic streetview images) indicate that to be a later addition. As such, the proposal appears to be re-instating an entry point here. Your future proposals (and the boundary elevation plans) should be very clear in respect of the level and nature of works proposed.

In terms of access, your future design and access statement must include commentary in terms of the accessibility and adaptability of the units. During our site visit you acknowledged that unit 4 at upper ground floor level would not provide step-free access (series of existing steps provided at the front of the building provides the sole access to this unit), with the internal layout meaning that step-free access does not appear to be possible to any other unit too. Obviously, the listed nature of the existing building represents a significant constraint on the accessibility of the units. However, commentary should be provided as to the steps to be taken to make the residential units as accessible to all as possible.

In terms of crime prevention, the Police's Designing out Crime Officer (DOCO) who has covered the Reading area for many years recently left Thames Valley Police and no permanent replacement has been appointed at the time of writing to my knowledge. As such, officers are struggling to obtain comments in the interim, with DOCO's from nearby areas understandably prioritising live major planning applications in town centres. Accordingly, I have not sought CPDA comments on this pre-application submission. In the circumstances I have however revisited previous comments provided by the CPDA in the recent past for comparable proposals and consider that your proposals should fully consider and comment on matters such as lighting, CCTV, entrance lobby arrangements (to minimise excessive

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permeability into a residential building it would be preferable for a secondary internal access controlled communal entrance door be included creating a secure airlock lobby at ground floor level – subject to listed building constraints); access control into and through the building; recommendation for residential post boxes provided within the ground floor airlock lobby area; 'Trades' buttons must not be provided as they can facilitate unrestricted or unauthorised access into private residential areas, (providing opportunities for crime and ASB). For best practice please see <https://www.securedbydesign.com/>

Amenity impacts on nearby occupiers

In terms of neighbour amenity, the proposals would be required to demonstrate adherence with Policy CC8 (Safeguarding Amenity). Any proposal of the nature proposed would need to carefully consider the impact on neighbouring and nearby occupiers. As per the 'quality of accommodation for future occupiers' section above, the removal of parking to the rear of the site would be a positive move in terms of the amenity of neighbouring occupiers, reducing potential for noise, disturbance, dust and fumes and smells from vehicles adjacent to the neighbouring amenity areas.

With regard to crime and safety, it would be assumed that the active use of the building would increase natural surveillance at the site and nearby to it too, in comparison to the existing vacant nature of the building. Any measures which would benefit the amenity of nearby occupiers should be explained within your supporting design and access statement.

In terms of privacy and overlooking, it is considered that to the north, south and west of the existing building, sufficient distances exist to mean no detrimental impacts would occur. To the east, it was seen on site that there are a number of side facing windows at 2b Tilehurst Road and vice-versa (see plans and site photos below). These provide opportunities for overlooking at distances of circa 5 metres. Given this is a pre-existing context and the listed nature of the building, there are considered to be few options available in terms of preventing a degree of mutual overlooking at this point. It is welcomed that the floorplans specify that these rooms would be proposed kitchens (rather than primary living spaces). Any measures which seek to minimise direct overlooking towards this neighbouring building would be welcomed and encouraged, but simultaneously any measures would need to protect the significance of the heritage asset.

In terms of the impacts of external lighting on nearby occupiers, this may occur should external lighting be proposed. Should external lighting be proposed, this would need to be carefully positioned in order to not cause a detrimental impact on the living environment of existing residential properties and be sensitive to the appearance/setting of the Listed building and the conservation area.

Given that no external extensions are proposed, no day/sunlight, visual dominance/overbearing effects, outlook or vibration impacts are anticipated to arise.

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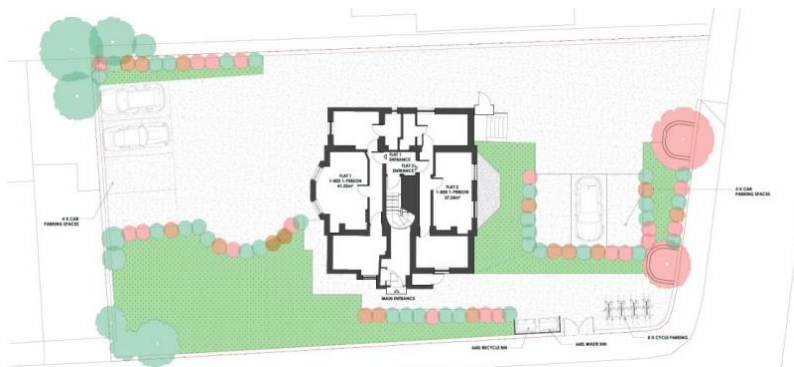


Photographs of the neighbouring 2b Tilehurst Road (19/06/2024)

Natural Environment Officer comments

The site is within a Conservation Area, an Air Quality Management Area and one of the two lowest canopy cover wards in the Borough. Moreover, it is also sited on a 'treed corridor' – improvements to the landscaping (currently consisting of two small trees on the frontage) is therefore justified by Policy EN14 and the adopted [Tree Strategy](#). It is also noted that the property is a listed building, hence improvements to the landscaping will also help with the setting of the building and improve its 'kerb appeal'. Lastly, the conversion to residential demands provision of some soft 'amenity space' which is currently lacking; with all the outside space appearing to have been used as parking.

The need for landscaping to improve the setting is acknowledged in the 'Proposal Statement', indicatively showing the landscape areas around the parking provision:



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Please refer to the 'Quality of accommodation for future occupiers' section above in terms of the form and function of the useable private amenity space.

The soft landscaping must contain tree planting, as indicated, and it will be expected for species to be chosen carefully to 1) maximise the canopy space available (particularly on the frontage) and 2) meet with the objectives of the above referenced Tree Strategy.

The submitted proposed layout plan indicates the retention of the only two trees currently on site (Tilehurst Road frontage). A tree survey should be undertaken to assess their condition (Planning Officer note: it was witnessed during the officer site visit that the tree closest to the vehicular access point had been partly damaged – see photographs below) and expected life span, followed by a brief Arboricultural Impact Assessment (AIA) if they are proposed to be retained. Whilst retention of trees is promoted in principle, if they are of poor quality, development offers an opportunity to remove and replace. As a reminder, no pre-emptive felling of these can take space without submission of a Section 211 Notice given their Conservation Area status. However, it would be expected for the prospective applicant to work positively with officers through the planning process.



Officer site photographs of a damaged tree at the front of the site (19/06/2024).

In conclusion, any future application similar to that indicated is likely to be supported in tree and landscape terms as it improves the greening on site in this high priority location. Submissions should include a Tree Survey, AIA (if applicable) and landscape principles.

Transport Officer comments

The site is located along the C400 Tilehurst Road. Frequent bus services can be accessed at bus stops located on the Tilehurst Road within easy walking distance of the site which provides a 20 minute frequency to and from the Town Centre and areas of Tilehurst. In NPPF terms, the site is highly sustainable.

The site currently benefits from a direct vehicular access off the Tilehurst Road and informal parking to the front and rear of the building.

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Google streetview and map images.

Access to the property will remain as existing and will continue to be taken from Tilehurst Road.

Policy TR5 states that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport. Local parking standards are set out in the RBC, Revised Parking Standards and Design Supplementary Planning Document (SPD). The parking requirement in this zone is 1 space per 1-bedroom unit. A total of 7 car parking spaces have been provided on-site which is acceptable for the level of development proposed*.

* Planning Officer comment: There is a conflict between earlier Officer comments regarding limiting the parking to the front of the site only (therefore meaning fewer than 7 spaces would be able to be provided) and Transport comments above specifying that 7 spaces would be required to comply with standards. In such instances I consider that a lower than policy compliant amount of parking spaces would be able to be justified, owing to the fairly central location of the site and its suitable access to public transport alternatives. As such, if balancing competing demands in the future, I would be minded to support the provision of solely an area of soft landscaping to the rear of the site, even if this resulted in fewer on-site car parking spaces being provided.

There are extensive parking controls and restrictions surrounding the site ensuring that any overspill will not impact on road safety. However, the prospective applicant should be advised that the future residents of the properties would not be entitled to apply for a residents parking permit for the surrounding residential streets, which would be controlled by condition. This will ensure that the development does not harm the existing amenities of the neighbouring residential properties by adding to the already high level of on street car parking in the area.

In accordance with the Borough's Parking Standards and Design SPD, a minimum provision 0.5 cycle storage spaces should be provided per flat. It is indicated that a cycle store will be located within the parking area. Quality, easy to use stands such as 'Sheffield' type stands are preferred over stacking systems and spacing between the stands should be 1000mm. The stands must be provided within a lockable, covered store.

Bin storage should comply with Reading's Household Waste Collection Service standards (as per the quality of accommodation section above). Therefore, it is recommended that the Council's Waste department is consulted at application stage to ensure that bin storage layout is suitable for the level of development proposed.

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Environmental Protection standing advice

Noise impact on development

A noise assessment should be submitted in support of applications for new residential proposed in noisy areas.

The noise assessment will be assessed against the recommendations for internal noise levels within dwellings and external noise levels within gardens / balconies in accordance with BS 8233:2014 and WHO guidelines for Community Noise. The report should identify any mitigation measures that are necessary to ensure that the recommended standard is met.

Where appropriate, the noise assessment data should also include noise events (LAMax) and the design should aim to prevent noise levels from noise events exceeding 45dB within bedrooms at night. Noise levels above 45dB are linked with sleep disturbance.

Internal noise criteria (taken from BS8233:2014)

Room	Design criteria	Upper limit
Bedrooms (23:00 to 07:00)	<30dB LAeq,8hour	
Living rooms (07:00 – 23:00)	<35dB LAeq,16hour	
Gardens & Balconies	<50dB LAeq,T	<55dB LAeq,T

Should insufficient information be submitted at application stage the following condition would be likely to be required in the event of permission being able to be granted:

Condition - Noise assessment for new residential dwellings

No development shall take place until a detailed scheme, informed by an assessment of the current noise environment, for protecting the dwellings from the external noise environment of the area has been submitted to and approved, in writing, by the Local Planning Authority. The scheme itself shall be designed, specified and constructed so that the sound insulation performance of the structure and the layout of the dwellings are such that the indoor ambient noise levels do not exceed the values detailed in Table 4 of BS 8233:2014. Where opening windows will lead to an internal noise level increase of 5 dBA or greater above BS 8233:2014 recommended internal levels, the scheme shall include provision of alternative mechanical ventilation with minimum performance equivalent to a mechanical heat recovery (MVHR) system with cool air bypass as an alternative means of cooling and ventilation. Noise from the system should not result in BS8233 internal levels being exceeded.

Thereafter, the development shall not be carried out other than in accordance with the approved scheme which shall be completed before any part of the accommodation hereby approved is occupied, unless the Local Planning Authority otherwise agrees in writing.

Reason: to protect the amenity of future occupants of the proposed development.

Air Quality - Increased exposure

The proposed development is located within an air quality management area that officers have identified with monitoring as being a pollution hot-spot (likely to breach the EU limit value for NO₂) and introduces new exposure / receptors. An air quality assessment, including (if applicable) air quality mitigation measures, should be provided as part of the application.

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The prospective applicant will need to demonstrate sufficient mitigation measures are implemented to protect the residents from the effects of poor air quality.

Where the development involves converting an existing building and allowing a buffer zone is not an option, then it may be that other mitigation can be applied. In the first instance this would be to implement measures to reduce the level at the facade of the property by creating a barrier between the property and the carriageway, such as close boarded fencing or planting vegetation.

If this is not possible then locating habitable rooms away from the source of pollution or the use of mechanical ventilation with the inlet on the clean side of the property may be acceptable. This list of potential measures is by no means an exhaustive list.

Mitigation against increased exposure:

- Mechanical ventilation – inlets from the 'clean' side of the development, long term maintenance needs to be addressed
- Buffer zones – consider increasing distance of the building façade from very busy roads
- Habitable rooms – consider placing stairwells, corridors and bathrooms on the façade fronting pollution source
- Mixed use – locate any sensitive uses on higher floors, allowing commercial use on lower elevations
- Balconies – consider avoiding use in areas of exceedence, especially on ground and first floor level
- Non-opening front windows – this should only be considered in certain circumstances, needs to be balanced against loss of freedom for future occupants

Reading Borough Council's Air Quality Policy EN15 requires that developments have regard to the need to improve air quality and reduce the effects of poor air quality through design, mitigation and where required planning obligations to be used to help improve local air quality.

Should insufficient information, regarding any required mitigation, be submitted at application stage the following condition would be likely to be required in the event of permission being able to be granted:

Condition - Air quality mitigation

No development shall take place until a detailed scheme demonstrating sufficient mitigation to protect the dwellings from poor air quality has been submitted to and approved in writing by the local planning authority. The scheme shall be implemented as approved prior to occupation of any part of the development and retained as approved at all times thereafter.

Reason: to protect the health of future occupants of the proposed development.

Furthermore, an information relating to sound insulation would also be recommended to minimise noise between separate residential units (albeit the listed nature of the building may constrain the extent and nature of measures that are feasible):

To minimise the disturbance by noise of future residential occupiers of the flats and its effect on neighbouring residents, residential accommodation must be designed and constructed or converted so as to achieve the insulation requirements set out in Building Regulations

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Approved Document E. (Planning Officer comment: It is also acknowledged that the building is listed, which may alter the normal requirements in this standing advice).

Bin storage – pest proofing

There is a widespread problem in Reading with rats. This is exacerbated by poor waste storage which provides them with a food source. You should consider how bins will be stored and ensure that bin stores are designed in such a way as to minimise access from vermin. It is strongly advised that design measures are stated at application stage to avoid the need for such matters to be sought and provided via condition in the event of permission being granted.

Ecology

As per the [Biodiversity Net Gain Addendum](#) note in relation to validation requirements for planning applications, the proposals will need to include relevant BNG information. Please see paragraph 3.1 via the link above, with paragraph 3.7 clarifying that this is required even if you consider the proposals to be exempt from the biodiversity gain condition. There are links within the document in respect of further information.

Notwithstanding the above, at a local level Policy EN12 (adopted 2019) requires on all site, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. In this instance, given the existing hardstanding at the site and the intended provision of soft landscaping, it is anticipated that biodiversity and geodiversity gains should be able to be achieved in the proposals, regardless of whether the scheme is later demonstrated to be exempt from BNG requirements or not.

Sustainability

The proposed development will need to demonstrate how it has been designed to incorporate measures to adapt to climate change in accordance with policies CC2 and CC3 of the Reading Borough Local Plan (2019). The [Sustainable Design & Construction SPD](#) goes into detail as to the various considerations and requirements at application stage in terms of the sustainability statement (e.g. Table A1.1 sustainable design checklist) required at application stage. The proposed residential units created through the conversion of the existing building would need to meet a BREEAM 'Very Good' standard, as per table 3.1 of the SPD. Table 3.2 of the SPD provides a summary of the BREEAM submission requirements, with a pre-assessment estimator required at application stage, together with a statement responding to each of the points within the Table A1.1 checklist (within the SPD). You will note that paragraph 3.5 of the SPD acknowledges that applications affecting some heritage assets may have difficulty in achieving the required standard and improvements insofar as is possible would be sought, with evidence/commentary required to fully evidence any shortfall.

To clarify, given that fewer than 10 residential units are proposed, no energy statement is required to be submitted.

CIL

Depending on when the building was last in active use, it could be that the proposals are liable to contribute towards the Council's [Community Infrastructure Levy](#) (CIL). The 2024 CIL charge for residential use is £179.29 per square metre. Your future application should include separate existing/proposed CIL floorplans to evidence (usually through colour coded and annotated plans to show areas included/not included) the floorspace figures stated on the separate CIL form submitted with your application. Whether the scheme is CIL liable will

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depend on a range of factors, with this being ascertained at the time of any future permission being granted (e.g. any vacancy period would be from the date of any future permission). As such, the CIL form and CIL plans (to evidence the CIL form figures) should be included in your future application submission.

S106 Legal Agreement

It is considered highly likely that a legal agreement will be required to include at least an affordable housing obligation, with other requirements possible based on application stage consultation responses and negotiations.

Public consultation

On the basis of the recent applications at the site, which attracted a significant amount of comments from interested third parties and local groups, it is strongly encouraged that prior to any application submission you undertake your own public consultation. [Please see pages 14-16 of the SCI](#) for more initial information. In this instance, I would expect you, as a minimum, to engage with neighbouring and nearby occupiers, the Conservation Area Advisory Committee ([CAAC](#)), Baker Street Area Neighbourhood Association ([BSANA](#)) and [Reading Civic Society](#), together with Abbey (which the site is within) and Coley (which the site borders) [Ward Councillors](#). It would be expected for the process you have followed to be evidenced at application stage within either a standalone statement of community involvement or within the design and access statement.

Type of application and timescales for a decision

Given the number of residential units proposed is fewer than 10, the planning application would be required to be determined within 8 weeks of a valid submission. Listed Building Consent would also be required, which have the same 8 week timescales for decisions. However, given the likely s106 legal agreement, you can anticipate that this will lead to an extended determination period in practice. Furthermore, owing to the high levels of third party representations on recent applications at the site, I consider that there is a reasonable likelihood that any application could be "called-in" by an elected member for consideration by the [Planning Applications Committee](#). The committee meets on a monthly basis, so if this were to occur then the timeframes for a decision would need to be amended accordingly.

Validation requirements

In terms of future validation requirements, please refer to [the November 2021 updated local validation checklist document](#) and the [BNG addendum](#) document. At this juncture I anticipate the following will be required:

Part 1: Mandatory national information requirements:

- Forms
- Ownership certificates/declaration
- Site location plan
- Block plan
- Application fee
- CIL form and plans ([see part 2, section 19 for floor plans to evidence the CIL floorspace figures](#))
- Design and Access Statement

Part 2:

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1. Affordable Housing Statement
2. Air quality statement
6. Ecological survey and reports – please see the BNG addendum document referenced above.
9. External lighting (if proposed)
11. Heads of Terms proposal (relating to at least affordable housing)
12. Heritage Statement (and also a schedule of works, as per the Conservation Officer comments above)
13. Landscape principles
15. Materials details (any cycle/waste store, if no external works to the building are proposed)
16. Noise & vibration impact assessment (see EP standing advice above)
18. Planning Statement
19. Plans and drawings – up to date existing and proposed floor plans, elevations and section plans should be submitted, including all information specified. In particular, this should include separate versions of the building elevations and boundary elevations, as existing and proposed, to fully demonstrate the extent of the existing/proposed boundary treatments around the site and how these may change as a result of the proposals (e.g. the re-opening of the access point onto Belle Vue Road to serve the bin and bike stores). It should also include CIL plans (as separately referenced above) and schedules of room sizes to show how they meet the Nationally Described Space Standards
20. Sustainability Statement, including BREEAM pre-assessment
22. Transport Statement (which can be included within the design and access statement)
23. Tree Survey and Arboricultural Impact Assessment (see Natural Environment Officer comments)
25. Vehicle (car/cycle) parking and waste storage / collection details
27. Viability Appraisal (if a policy compliant contribution towards affordable housing is not proposed)

Non-statutory requirements, but strongly encouraged:

Statement of community involvement, either as a standalone document or within the Design and Access Statement.

Concluding comments

In overall terms it is considered that the principle of the change of use is likely to be able to be justified and bringing the Listed building back into active use is broadly strongly supported. You should be especially mindful of comments in relation to the extent and nature of intrusive works (as per the Conservation Officer comments) and matters in relation to the mix of units, form and location of external amenity space and affordable housing. It is considered that whilst there are a number of areas which require careful consideration and input on your part, it is possible that a supportable scheme could be arrived at if this pre-application advice is followed.

JRM/RE

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